

**Midwest Energy Cooperative d/b/a Midwest Connections
Rural Broadband Experiment (SAC 316131)
WC Docket No. 14-259
CERTIFICATION OF COMPLIANCE WITH RURAL BROADBAND EXPERIMENT
15-MONTH BUILD-OUT MILESTONES**

Midwest Energy Cooperative d/b/a Midwest Connections (“Midwest”) submits this certification as required by Paragraph 75 of the Rural Broadband Experiment Order¹ (“RBE Order”). Paragraph 75 states that all recipients of RBE funding that elected to receive the accelerated disbursement option must file evidence within 15 months of their first disbursement that they have deployed to at least 25% of the number of required locations. All of the information provided herein is current as of April 30, 2017.

Background

In the Rural Broadband Experiments, the FCC made \$75 million available for projects capable of providing 100 Mbps downstream/25 Mbps upstream to all locations within the selected census blocks while offering at least one service plan that provides 25 Mbps upstream to all locations within the selected census block.² The FCC offered recipients the opportunity of accelerating disbursement of support for winning bidders in the experiments for those entities that commit to deploy at least 25 percent of the requisite number of locations within the first 15 months.³ Midwest was awarded \$211,532 in Category One Rural Broadband Experiment (“RBE”) funding. Midwest’s RBE award was authorized on February 9, 2016 and the first disbursement was issued on February 29, 2016. Midwest elected the accelerated funding distribution and on that date received the initial 30% payment amount of \$64,693.53. The remaining 70% of the award is being distributed in equal monthly payments of \$1,233.93 over 120 months. The first regular monthly payment was received March 31, 2016.

Description of the Status of Midwest’s Project

Construction and Deployment to Covered Census Blocks

At full build-out in 2019, Midwest Energy will own and operate a 2,052-mile fiber communications network providing members a diverse menu of smart grid programs and services designed to enhance reliability while helping them manage their energy use better. By utilizing Midwest Energy’s fiber assets Midwest Connections further benefits residents of rural southwest Michigan through the deployment of a bi-directional fiber-to-the-premises (“FTTx”) open network using gigabit passive optical network (“GPON”) electronics to every home and business in the Midwest Study Area. Residential data plans start at 25 Mbps down and 10 Mbps up and a gigabit service is under consideration. Commercial services are symmetrical. Voice services are provided by Big River Telephone.

¹ *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-901 WC Docket No. 14-58 (rel. July 14, 2014) (“RBE Order”) at para. 75.

² RBE Order at para. 26.

³ RBE Order at para. 75.

As of April 30, 2017, Midwest has completed construction of fiber to the home infrastructure to 364 geocoded locations in the 31 census blocks covered by the RBE award of \$211,532. In a public notice, dated February 9, 2016, Midwest was awarded funds to connect 421 covered locations.⁴ At this time, Midwest has passed 86% of those locations, easily surpassing the RBE requirement of 25%. **Exhibit A** provides a spreadsheet with the geocoded locations and the granular data related to each.

Evidence of Meeting Public Service Obligations

1. **Minimum Speeds**: Category One recipients must offer at least one service plan that provides 25 Mbps downstream/5 Mbps upstream to all locations within the selected census blocks. **Exhibit B** includes screenshots from Midwest's website demonstrating that Midwest offers and advertises at least one plan that meets this criterion.
2. **Minimum Usage Allowance**: Category One recipients must offer a service plan with a monthly usage allowance that is reasonably comparable to comparable wireline offerings in urban areas. **Exhibit C** is a screenshot from Midwest's website demonstrating that Midwest advertises unlimited data on all of its service offerings.
3. **Latency**: The RBE Order requires participants to certify that 95% or more of all peak period measurements of network round trip latency are at or below 100 ms. Based on its network design (fiber) and internal testing, Midwest certifies that its network latency satisfies this requirement.
4. **Reasonable Comparability Benchmark**: Under the RBE program, Midwest is required to offer broadband service at rates that are at or below the relevant reasonable comparability benchmark. The current benchmark for residential voice services is no more than \$49.51, while the current benchmark for broadband service with speeds of 25 Mbps symmetrical service is \$91.52. **Exhibit D** contains screenshots from Midwest's website demonstrating that Midwest's pricing for voice and broadband services easily satisfies the reasonable comparability benchmark.

⁴ *Rural Broadband Experiment Support Authorized for Winning Bids Submitted by Midwest Energy Cooperative d/b/a Midwest Connections and Northern Valley Communications, LLC*, WC Docket Nos. 10-90 and 14-259, Public Notice, DA 16-151 (2016).